

1 Scott H. Sims, State Bar No. 234148  
2 Andrew D. Stolper, State Bar No. 205462  
3 FRANK SIMS & STOLPER LLP  
4 19800 MacArthur Boulevard, Suite 855  
5 Irvine, California 92612,  
6 Telephone: (949) 201-2400  
7 Facsimile: (949) 201-2401  
8 [astolper@lawfss.com](mailto:astolper@lawfss.com)  
9 [ssims@lawfss.com](mailto:ssims@lawfss.com)

10 Attorneys for Judgment Creditor  
11 JASON FRANK LAW, PLC

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

14 In re

15 EAGAN AVENATTI, LLP,  
16 Debtor.

Case No. 8:18-CV-01644-VAP-KES

**JOINT STIPULATION RE APPOINTMENT  
OF RECEIVER AND RESTRAINING  
ORDER**

*[[Proposed] Order Filed Concurrently herewith]*

**STIPULATION**

This Stipulation is entered into by and between Judgment Debtor Eagan Avenatti, LLP (“EA”) and Michael Avenatti (“Avenatti”), on the one hand, and Judgment Creditor Jason Frank Law, PLC (“JFL”), on the other hand (collectively, the “Parties”).

WHEREAS, JFL has a judgment against EA in the amount of \$10,000,000.00, plus accruing interest at \$564.38 per day (since May 22, 2018) and reasonable attorney fees and costs incurred by JFL in enforcing the judgment (the “Judgment”);

WHEREAS, on February 7, 2019, this Court ordered EA and Avenatti to appear for a judgment debtor examination on February 14, 2019 at 9:30 a.m. in Courtroom 6D of this Court (Doc. 50);

WHEREAS, on February 12, 2019, JFL filed a Motion for Appointment of Receiver and Restraining Order (“Motion”) (Doc. No. 51);

WHEREAS, EA and Avenatti have stipulated and agreed to the relief requested in the Motion and have further agreed that the Magistrate Judge Karen E. Scott shall have the jurisdiction and authority to enter the [Proposed] Order Appointing Receiver and Issuing Restraining Order (the “Order”) filed concurrently herewith; and

WHEREAS, upon entry of the Order, JFL has agreed to withdraw the Motion and all pleadings and exhibits relating thereto and consent to the rescheduling of the judgment debtor exam to March 8, 2019 at 9:30 a.m. in Courtroom 6D of this Court.

ACCORDINGLY, the Parties stipulate and agree as follows:

1. The Parties, and each of them, stipulate to the terms of the Order;
2. The Parties, and each of them consent to the jurisdiction of the Magistrate Judge Karen E. Scott to enter the Order and to supervise the Receivership;
3. Upon entry of the Order, the Motion is deemed withdrawn without prejudice; and
4. Upon entry of the Order, the judgment debtor exam of EA and Avenatti is continued to March 8, 2019 at 9:30 a.m. in Courtroom 6D of this Court, located at 411 W. 4th Street, Santa Ana, California 92701.

1 IT IS SO STIPULATED

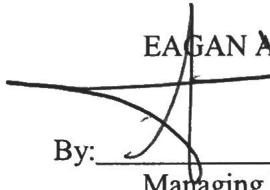
2  
3 Dated: February 13, 2019

FRANK SIMS & STOLPER LLP

4  
5 By: /s/ Scott H. Sims  
6 Scott Sims, Esq.  
7 Attorneys for Judgment Creditor  
Jason Frank Law, PLC

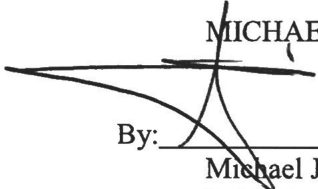
8 Dated: February 13, 2019

EAGAN AVENATTI, LLP

9  
10 By:   
11 Managing Partner  
12 Judgment Debtor Eagan Avenatti, LLP

13  
14 Dated: February 13, 2019

MICHAEL J AVENATTI

15  
16 By:   
17 Michael J. Avenatti  
18 In his Personal Capacity  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28